

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION

This document relates to:

All Cases Noted on Attached Exhibit

MDL No. 2804

Case No. 1:17-md-2804

JUDGE DAN AARON POLSTER

**MASTER STIPULATION AND [PROPOSED] ORDER
DISMISSING WITH PREJUDICE CLAIMS
PURSUANT TO FLORIDA ENDO SETTLEMENT AGREEMENT**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel of record for the Plaintiff Subdivisions identified in Appendix A (collectively, “Dismissing Plaintiffs”) and Defendants Endo Health Solutions Inc., Endo Pharmaceuticals Inc., Endo International plc, Par Pharmaceutical, Inc. and Par Pharmaceutical Companies, Inc. (collectively, “Endo and Par Defendants”¹) that, pursuant to the election of each Dismissing Plaintiff to participate in the Endo Settlement Agreement attached hereto as Appendix B, all claims of each Dismissing Plaintiff against any Endo or Par Defendant are hereby voluntarily **DISMISSED WITH PREJUDICE**, with each party to bear its own costs.

¹ The Endo Settlement Agreement is between the State of Florida, Office of Attorney General on the one hand and Endo Health Solutions Inc. and Endo Pharmaceuticals Inc. on the other, but the Endo Settlement Agreement provides for participation by Dismissing Plaintiffs conditioned on their agreement, among other things, to release and dismiss their claims against all “Releasees,” which include not only Endo Health Solutions Inc. and Endo Pharmaceuticals Inc. but also the other Endo and Par Defendants defined herein. Endo Settlement Agreement §A(cc) & Ex. D (attached as Appendix B). To the extent the parties discover that any Released Claim of any Dismissing Plaintiff remains pending against any Releasee following filing of this stipulation, the parties shall stipulate to the dismissal of those claims in a subsequent filing.

Dated: May 3, 2022

Respectfully submitted,

Agreed as to form and substance:

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SO ORDERED this ___ day of May, 2022.

Hon. Dan Aaron Polster
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that on May 3, 2022, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system. Copies will be served upon counsel of record by, and may be obtained through, the Court CM/ECF system.

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